

REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-21 in the application. The Applicants have not amended, canceled or added any claims. Accordingly, Claims 1-21 are currently pending in the application.

I. Formal Matters and Objections

The Examiner has located a typographical error in the specification. More specifically, the Examiner found the inadvertent error of "application interface 243" instead of "application interface 324." In response, the Applicants have amended the specification to correct this error and appreciate the Examiner's diligence in finding and bringing this error to their attention.

II. Rejection of Claims 1-21 under 35 U.S.C. §103

The Examiner has rejected Claims 1-21 under 35 U.S.C. §103(a) as being unpatentable over an article to Juels, *et al.* (Juels) entitled Client Puzzles: A Cryptographic Countermeasure Against connection Depletion Attacks: Proceedings of Network and Distributed Security Systems (NDSS) '99 in view of U.S. Patent No. 6,236,972 to Shkedy. The Applicants respectfully disagree.

Juels is directed to a cryptographically based countermeasure against connection depletion attacks. (Abstract). Juels does not teach or suggest employing a database to validate a putative solution as recited in Claims 1, 8 and 15. To cure this deficiency, Shkedy has been cited. (Examiner's Action, page 3). One skilled in the art, however, would not be motivated to modify the teachings of Juels with the cited database teachings of Shkedy since Juels explicitly teaches away from employing a database to validate a solution. For example, Juels teaches a client puzzle

protocol that requires a puzzle be constructed in a stateless way. In particular, Juels teaches a server **must** be able to verify without the use of a database that a puzzle solved by a client is legitimate. (Page 156, first column, first full paragraph). Juels, therefore, strongly teaches away from combining with Shkedy and also strongly teaches away from the present invention.

Thus, one skilled in the art would not be motivated to combine Shkedy with Juels to arrive at the present invention since Juels explicitly teaches away from employing a database to validate a solution. Accordingly, the cited combination of Juels and Shkedy does not provide a *prima facie* case of obviousness for independent Claims 1, 8 and 15 and Claims dependent thereon. The Applicants therefore respectfully request the Examiner withdraw the 35 U.S.C. §103(a). rejection and allow issuance of Claims 1-21.

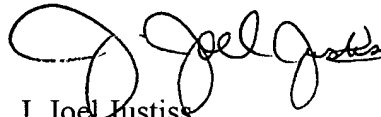
III. Conclusion

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-21.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

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